

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

NANCY WILSON, Regional Director of the Sixth
Region of the NATIONAL LABOR RELATIONS
BOARD, for and on behalf of the NATIONAL
LABOR RELATIONS BOARD,

Petitioner

v.

PG PUBLISHING CO., INC. D/B/A PITTSBURGH
POST-GAZETTE,

Respondent

Civil No. 2:24-cv-01166-CB

**MOTION FOR LEAVE TO EXCEED PAGE LIMIT FOR MEMORANDUM OF POINTS
AND AUTHORITIES IN SUPPORT OF AMENDED PETITION FOR INJUNCTION**

Petitioner respectfully requests this Honorable Court grant Petitioner leave to file a Memorandum of Points and Authorities in Support of Amended Petition for Injunction Under Section 10(j) of the National Labor Relations Act, as Amended (Memorandum) in excess of the 25 pages permitted by Section II.C of the Practices and Procedures of Judge Cathy Bissoon. In support of this Motion, Petitioner states the following:

1. The Regional Director of the Sixth Region of the National Labor Relations Board has issued complaints against Respondent PG Publishing Co., Inc. d/b/a Pittsburgh Post-Gazette (PPG) in four cases based on unfair labor practice charges filed by four Unions.¹

¹ The four Unions involved in this matter are the Newspaper Guild of Pittsburgh, a/w CWA Local 38061 (the NewsGuild); Pittsburgh Mailers Union No. M-22, a/w CWA Local 14842 (the Mailers); Pittsburgh Newspaper Printing Pressmen's / Paper Handlers Local Union No. 9N, a/w The Graphic Communications Conference / IBT Local 24M/9N (the Pressmen); and Pittsburgh Typographical Union No. 7, a/w CWA Local 14827 (the Advertisers).

2. On August 14, 2024, Petitioner filed a Petition for Injunction Under Section 10(j) of the National Labor Relations Act, as Amended (Petition), seeking a temporary injunction directing PPG to, *inter alia*, bargain in good faith with the four Unions over successor collective-bargaining agreements; bargain in good faith with the Mailers and Pressmen for interim agreements for health benefits; restore the lawful status quo for the bargaining unit represented by the NewsGuild; to prospectively cover health costs on an interim basis for full-time employees in the bargaining units represented by the Mailers, Pressmen, and Advertisers. The Petition filing included a Memorandum that was 50 pages in length, excluding the Table of Contents and Table of Authorities.

3. On August 20, 2024, Judge Cathy Bissoon issued an order directing Petitioner's counsel to refile the Memorandum consistent with Section II.C of the Practices and Procedures of Judge Cathy Bissoon, which provides that supporting briefs are limited to twenty-five pages in length.

4. This is an enormously complex matter, concerning the courses of bargaining between PPG and the Unions (each in separate negotiations) during a period of over five years since early 2017 and the Union's ensuing strikes, which began in October 2022 and are ongoing to this day. The administrative record of the four underlying unfair labor practice hearings is extensive, consisting of transcripts of 34 days of sworn testimony given before an administrative law judge and more than 2000 documentary exhibits. Although Petitioner's counsel has attempted to streamline the Memorandum as much as possible, twenty-five pages are insufficient for Petitioner to adequately explain the factual background, legal issues, and why injunctive relief under section 10(j) of the National Labor Relations Act, as amended, is warranted.

5. Petitioner's counsel has made several unsuccessful attempts, by phone and email, to obtain PPG's position on this Motion. PPG has not responded to any of the messages from Petitioner's counsel.

6. Therefore, Petitioner respectfully requests leave to file the Proposed Memorandum (attached as Exhibit A), which is twenty-nine pages in length, excluding the Table of Contents and Table of Citations.

7. No party will be prejudiced by a grant of this motion.

WHEREFORE, Petitioner respectfully requests this Honorable Court to grant its Motion for leave to exceed the page limit for its Memorandum.

Dated at Pittsburgh, Pennsylvania this 10th day of September, 2024.

/s/Anne E. Tewksbury

Anne E. Tewksbury (Attorney ID: PA 33314)
Attorney for the Petitioner
National Labor Relations Board, Region 6
1000 Liberty Avenue, Room 904
Pittsburgh, PA 15222
Telephone: (412) 690-7115
Fax: (412) 395-5986
Anne.Tewksbury@nrlrb.gov